

#### **VIA ELECTRONIC MAIL**

March 31, 2011

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street Washington, DC 20554

Re:	WC Docket No. 10-90	Connect America Fund
	GN Docket No. 09-51	A National Broadband Plan for our Future
	WC Docket No. 07-135	Establishing Just and Reasonable Rates for Local
		Exchange Carriers
	WC Docket No. 05-337	High-Cost Universal Service Support
	CC Docket No. 01-92	Developing a Unified Intercarrier Compensation
		Regime
	CC Docket No. 96-45	Federal-State Joint Board on Universal Service
	WC Docket No. 03-109	Lifeline and Link-up
		NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On March 30, 2011, a group of small ILEC company managers and other representatives; telecommunications consultants; and others (collectively "Attendees") met with several members of the staff of the Wireline Competition Bureau (WCB). Attendees included Paul Cooper of FWA; Catherine Moyer of Pioneer Communications; Tom Gleason of Gleason & Doty; Brian Boisvert of Wilson Communications; Steve Davis of South Central Telephone; Kathy Billinger of Peoples Telecom; Mark Gailey of Totah Communications; Dennis Doyle of Blue Valley Telecom; Chris Schroeder of TCA; and Doug Kitch of Alexicon Telecommunications Consulting. Participants from the WCB included Carol Mattey, Deputy Bureau Chief; Gary Seigel; Scott Mackoul, WTB/Auctions & Spectrum Access Division; Ted Burmeister; Alexander Minard; Katie King; Rebekah Goodheart; Joe Cavender; Ken Burnley; and Amy Bender, TAPD Deputy Division Chief.

During the meeting we reviewed both company-specific and aggregated financial data depicting how proposed rule changes contained in the Commission's Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking in the above-captioned dockets (FCC 11-13, released February 9, 2011) will have harmful and potentially devastating consequences for FWA, TCA, and Alexicon's clients, all of whom are small local exchange carriers serving rural and remote areas in the United States. In addition we discussed the Bureau's necessitated request for non-regulated financial data as well as their feedback on the Commission's intent to possibly use non-regulated financial data to offset Title II Intercarrier Compensation and potential Connect America Fund revenues. Participants of the WCB were provided with handouts during the

meeting which summarize FWA, TCA, Pioneer Communications, and Alexicon's points made during the meeting. A copy of those handouts is included with this letter.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Sincerely,

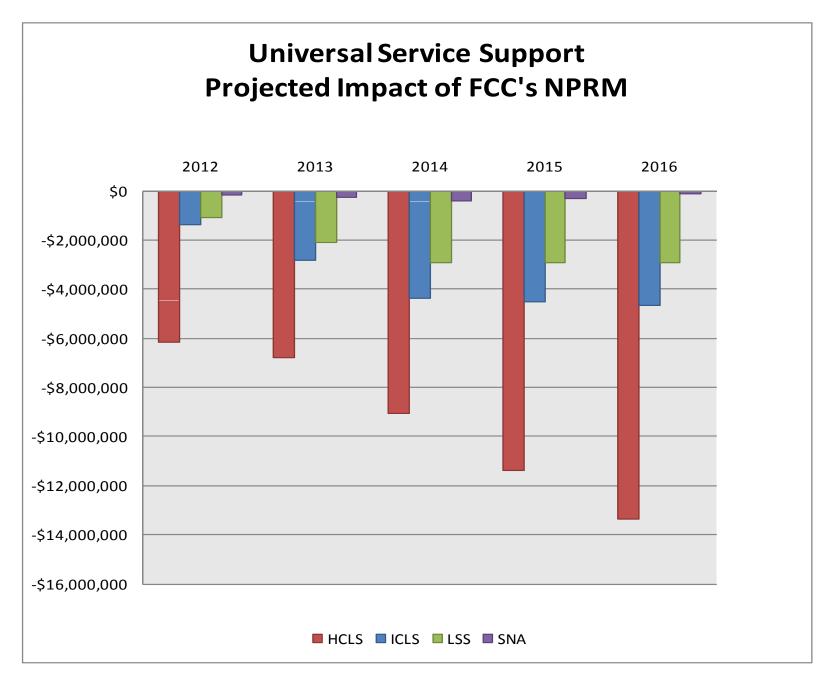
Douglas K. Kitch, Principal

Alexicon Telecommunications Consulting

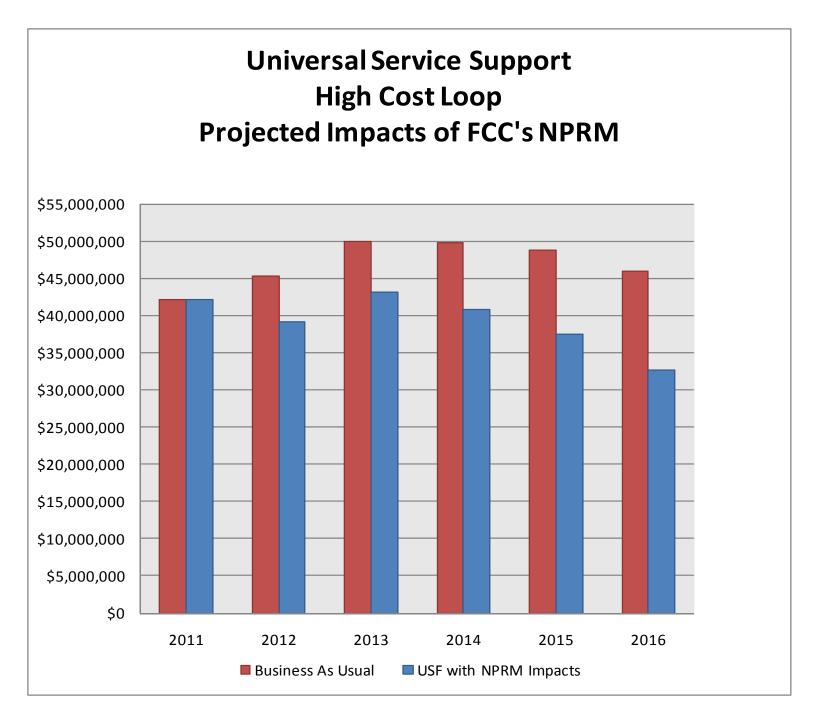
Enclosures

# Impacts of the FCC's NPRM

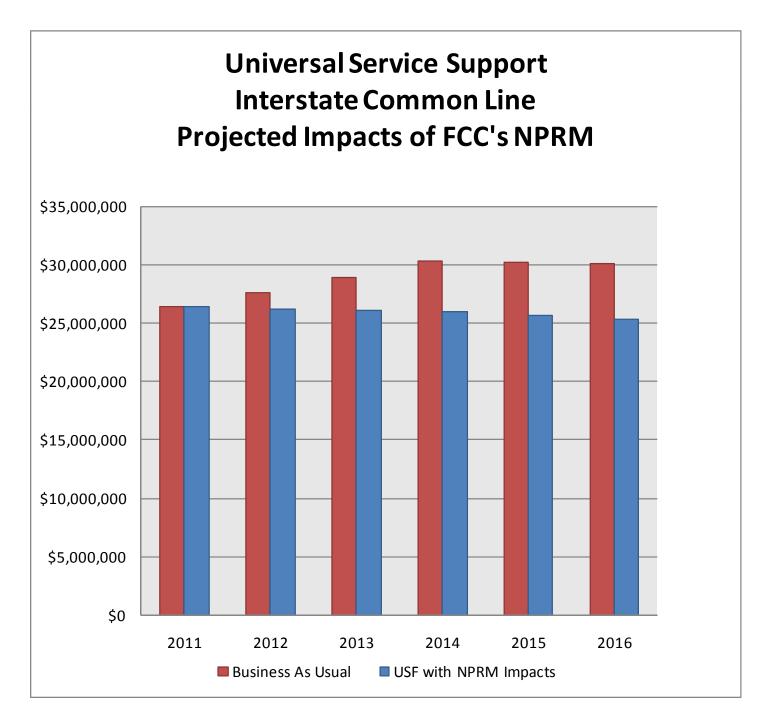
- 16 Kansas RLECs
- Projections for years 2012 through 2016
- Total HCL, ICLS, LSS, and SNA Revenue
- Total Revenues of \$403 Million
- Projected Reduction of \$78 Million
  - Almost 20%
- 27% Reduction in 2016



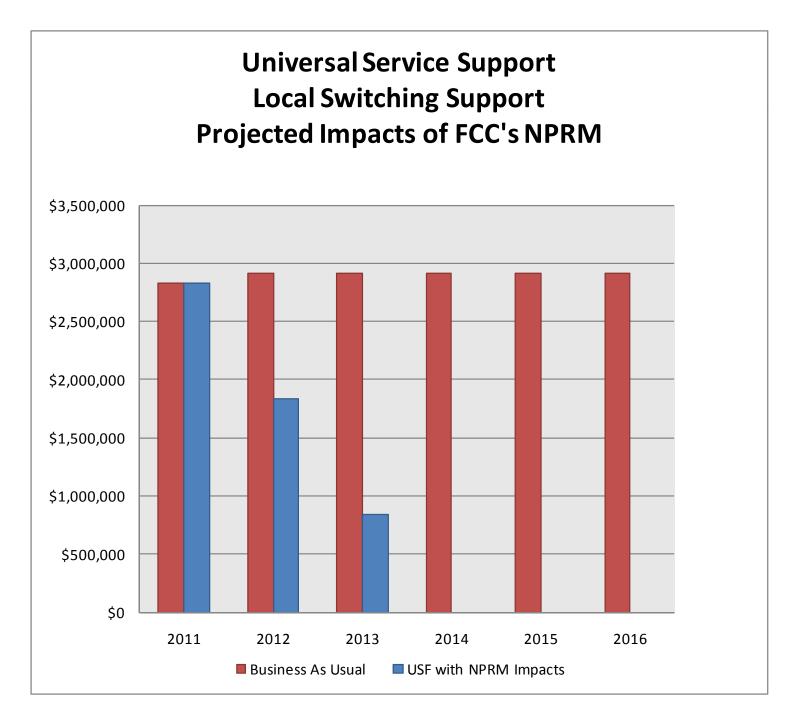
- Summary of Total Revenue Impacts



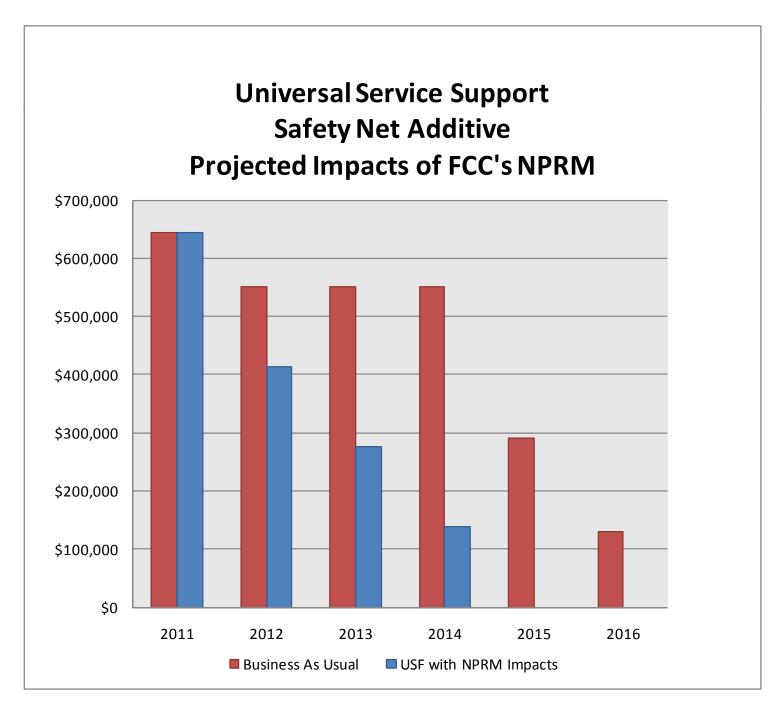
- Total Projected High Cost Loop Revenue



- Total Projected Interstate Common Line Revenue



- Total Projected Local Switching Support Revenue



- Total Projected Safety Net Additive Revenue

## Sample Impacts of FCC's NPRM

Company A

- 2011 TIER 2.05

- 2014 TIER .08

Company B

- 2011 TIER 1.32

- 2014 TIER .34

 The impacts of the NPRM are devastating to RLECs, including those that have borrowed RUS funds to build networks.

• TIER = Times Interest Earned. This is a part of the RUS loan covenants and is usually about 1.00.

	pany 1		2011	2012	2012	2014
	onal Broadband Plan NPRM February 2011 nated Reduction to ALL USF Mechanisms per FCC Proposals	Source	2011	2012	2013	2014
LStill	nated Reduction to ALL OSF Weethanisms per Fee Froposais	Jource				
1	ICLS Base (CL Rev Reg less SLCs)	2010 Forecast-Kept Flat	10,475,965	10,475,965	10,475,965	10,475,965
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	10,475,905	(434,634)	(882,438)	(1,317,072)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	10,475,965	10,041,331	9,593,527	9,158,893
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-4.1%	-8.4%	-12.6%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		403.01	406.43	410.84
7	company monage responses	2 37 12		.00.02	100110	
8	Local Switching Support Base	2010 Forecast - Kept Flat	109,855	109,855	109,855	109,855
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(42,426)	(79,777)	(109,855)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)		67,429	30,078	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)	· ·	-38.6%	-72.6%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		2.71	1.27	-
14	p- 7 0	,				
15	HCL Calculated Under Current Rules	HCL Calculated	9,641,379	13,959,137	17,465,842	17,898,861
_	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated		(1,914,134)	(2,378,910)	(2,433,861)
	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	_	(679,810)	(1,311,639)	(1,848,939)
18	HCL with NACPL Reset	See Footnote 1	0	475,291	474,484	525,264
19	Combined Impact to HCL Support	See Footnote 2	0	(2,088,913)	(3,101,977)	(3,578,315)
20				(_,;;;,;==,	(5,252,555)	(=,===,===,
	HCL with All Proposed Revisions	Line 15 + Line 19	9,641,379	11,870,224	14,363,865	14,320,546
22	Company Percent Reduction in HCL USF	Line 19/15		-15.0%	-17.8%	-20.0%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		476.42	608.53	642.38
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	614,364	614,364	614,364	614,364
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(153,591)	(307,182)	(460,773)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	614,364	460,773	307,182	153,591
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		18.49	13.01	6.89
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	20,841,563	25,159,321	28,666,026	29,099,045
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(2,719,564)	(4,371,374)	(5,466,015)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	20,841,563	22,439,757	24,294,652	23,633,030
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	20,841,563	22,439,757	24,294,652	23,633,030
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-10.8%	-15.2%	-18.8%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(109.15)	(185.19)	(245.19)
41						
42	Access Lines	Reduced 5% per yr	26,227	24,916	23,604	22,293

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 2					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	2,304,283	2,304,283	2,304,283	2,304,283
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(159,100)	(323,021)	(482,121)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	2,304,283	2,145,183	1,981,262	1,822,162
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-6.9%	-14.0%	-20.9%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		543.72	530.08	516.19
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	336,422	336,422	336,422	336,422
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(123,911)	(234,791)	(336,422)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	336,422	212,511	101,631	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-36.8%	-69.8%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		53.86	27.19	-
14	. , , , ,	,				
15	HCL Calculated Under Current Rules	HCL Calculated	6,500,000	5,606,395	6,116,407	6,656,861
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	, , , , , , , , , , , , , , , , , , ,	(786,527)	(855,032)	(865,645)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated		(295,660)	(602,848)	(899,773)
18	HCL with NACPL Reset	See Footnote 1	0	75,741	73,373	81,225
19	Combined Impact to HCL Support	See Footnote 2	0	(1,011,108)	(1,318,580)	(1,582,170)
20	The state of the s			( )	( ): -,:,	( )==
	HCL with All Proposed Revisions	Line 15 + Line 19	6,500,000	4,595,287	4,797,827	5,074,691
22	Company Percent Reduction in HCL USF	Line 19/15		-18.0%	-21.6%	-23.8%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		1,164.73	1,283.63	1,437.57
25					·	·
26	SNA Calculated per Current Rules	USAC SNA Source Data	85,608	85,608	85,608	85,608
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(21,402)	(42,804)	(64,206)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	85,608	64,206	42,804	21,402
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		16.27	11.45	6.06
32		·				
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	9,226,313	8,332,708	8,842,720	9,383,174
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(1,315,521)	(1,919,196)	(2,464,919)
	Preliminary Adjusted USF	Sum Lns 3+10+21+28	9,226,313	7,017,187	6,923,524	6,918,255
	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	9,226,313	7,017,187	6,923,524	6,918,255
38	Company Percent Reduction in Total USF	Line (34+36)/33		-15.8%	-21.7%	-26.3%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median	3.370	-16.4%	-25.0%	-33.2%
	Average per Line Reduction in Total USF	Line (34+36)/42		(333.44)	(513.47)	(698.27)
41	0- per ania nessation in 1988, 991	2.110 (34.30)/42		(333.14)	(525.17)	(550,27)
	Access Lines	Reduced 5% per yr	4,153	3,945	3,738	3,530
ı '-		neddeed 370 per yr	7,133	3,343	3,733	3,330

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

CLS Base (CL Rev Req less SLCs)   2010 Forecast-Kept Flat   1,147,359   1,14		pany 3		2011	2012	2012	2014
CLS Base (CL Rev Req less SLCs)   2010 Forecast-Kept Flat   1,147,359   1,14		onal Broadband Plan NPRM February 2011	Carran	2011	2012	2013	2014
2 Reduction to ICLS funding Due to Corp Exp Phase-out by 2014 Revised ICLS with Proposed Changes (Less SLC Revenues)   (Line 2 - Line 1)	ESTIN	nated Reduction to ALL OSF Wechanisms per FCC Proposais	Source				
2 Reduction to ICLS funding Due to Corp Exp Phase-out by 2014 Revised ICLS with Proposed Changes (Less SLC Revenues)   (Line 2 - Line 1)	1	ICLS Pasa (CL Pay Pag loss SLCs)	2010 Foregoet Kent Flat	1 147 250	1 147 250	1 147 250	1 147 250
Revised ICLS with Proposed Changes (Less SLC Revenues)			· ·		i i		
Company Percent Reduction in ICLS   (In 2 / Ln 1)   .7.0%   .14.3%   .2.2		,	, , , , , ,		, , ,		
Median Percentage Reduction - All Alexicon Clients			,	1,147,339			-
Company Average ICLS per Line		· ·	, , ,				-21.3%
The company Percent Reduction in ILSS   Company Average LSS per Line   Line 10/42   Company LSS per Line 10   Line 10/42   L	_	1					-21.9%
B   Local Switching Support Base   2010 Forecast - Kept Flat   425,346   4		Company Average ICLS per Line	Line 3/42		921.00	896.29	871.04
Proposed Reduction to Local Switching Support   Eliminate 33%/67%/100%   Une 8 - Une 9   425,346   257,483   117,461   Une 9 - Une 9   Une 9 - Une 9   Une 9 - Une 9		Local Cuitabing Cuppert Dasa	2010 5	425.246	425 246	425.246	425.246
LSS Phased Down to Zero by 2014			· ·		·	•	425,346
Company Percent Reduction in LSS   (Ln 9 / Ln 8)   39.5%   72.4%   -100		, · · · · · · · · · · · · · · · · · · ·			, , ,		(425,346)
Median Percentage Reduction - All Alexicon Clients			,	425,346	·	· · · · · · · · · · · · · · · · · · ·	122.22/
Company Average LSS per Line		1					-100.0%
HCL Calculated Under Current Rules HCL Calculated HCL with Proposed 55%/65% Factors Reduced From 65%/75% HCL with NACPL Reset See Footnote 1 0 21,685 21,648 23, Combined Impact to HCL Support  HCL with All Proposed Revisions Line 15 + Line 19 Line 19/15 HCL with All Proposed Revisions Line 19/15 Company Percent Reduction in HCL USF Line 19/15 HCL with All Proposed Revisions Line 19/15 Line 21/12 Line 21/							-100.0%
HCL Calculated Under Current Rules		Company Average LSS per Line	Line 10/42		222.34	107.06	-
HCL with Proposed 55%/65% Factors Reduced From 65%/75%   HCL Calculated   HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)   HCL Calculated   User Calculated							
HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)   HCL Calculated   See Footnote 1   O   21,685   21,648   23,							2,267,721
HCL with NACPL Reset   See Footnote 1   O   21,685   21,648   23,						, , ,	(304,523)
Combined Impact to HCL Support   See Footnote 2   O (337,160) (506,260) (617,100)		1					(675,668)
HCL with All Proposed Revisions					,		23,964
HCL with All Proposed Revisions		Combined Impact to HCL Support	See Footnote 2	0	(337,160)	(506,260)	(617,573)
Company Percent Reduction in HCL USF							
Median Percentage Reduction - All Alexicon Clients			Line 15 + Line 19	1,738,938	, , , , , , , , , , , , , , , , , , ,		1,650,148
Company Average HCL per Line		1	Line 19/15				-27.2%
25 26 27 28 28 29 29 20 20 20 21 21 21 22 22 23 23 24 25 26 20 20 25% per yr Elimination 0 (5,139) (10,278) (15,278)		1					-33.6%
SNA Calculated per Current Rules   USAC SNA Source Data   20,556		Company Average HCL per Line	Line 21/42		1,327.42	1,583.29	1,592.58
27       Reduction to SNA - Phased Down to Zero by 2015       25% per yr Elimination       0       (5,139)       (10,278)       (15,278)         28       Estimated Revised Safety Net Additive Support-Zero in 2015       (Ln 26-Ln 27)       20,556       15,417       10,278       5,         29       Company Percent Reduction in SNA       (Ln 27 / Ln 26)       -25.0%       -50.0%       -75         30       Median Percentage Reduction - All Alexicon Clients       All Clients - Median       -25.0%       -50.0%       -75         31       Company Average SNA per Line       Line 28/42       13.31       9.37       4         32       Total USF Support Under Current Rules       Sum Ln 1+8+15+26       3,332,199       3,467,634       3,836,545       3,860,34         34       Total USF Support Under Current Rules       Sum Ln 2+9+19+27       0       (590,956)       (988,460)       (1,303,35)         35       Preliminary Adjusted USF       Sum Lns 3+10+21+28       3,332,199       2,876,678       2,848,085       2,557,4         36       Proposed \$3,000 USF Capped Support per Line       Total USF / Access Lines       0       0       0       0         37       Reduced USF Support per FCC Proposals       (Line (34+36)/33       0.0%       -17.0%       -25.8%       -33<							
Estimated Revised Safety Net Additive Support-Zero in 2015  (Ln 26-Ln 27)  20,556  15,417  10,278  5,  Company Percent Reduction in SNA  (Ln 27 / Ln 26)  Median Percentage Reduction - All Alexicon Clients  All Clients - Median  Company Average SNA per Line  Company Average SNA per Line  Sum Ln 1+8+15+26  3,332,199  3,467,634  3,836,545  3,860,345  Total USF Support Under Current Rules  Sum Ln 2+9+19+27  Total Estimated Reduction to USF Support Levels  Sum Ln 2+9+19+27  Sum Ln 2+9+19+27  Freliminary Adjusted USF  Sum Ln 3+10+21+28  3,332,199  2,876,678  2,848,085  2,557,36  Reduced USF Support per FCC Proposals  Company Percent Reduction in Total USF  Line (34+36)/33  Median Percent Reduction in Total USF  Line (34+36)/42  Line (34+36)/42  (510.30)  Line (300.98)  (1,257)	26		USAC SNA Source Data	20,556	20,556	•	20,556
Company Percent Reduction in SNA  Median Percentage Reduction - All Alexicon Clients  Company Average SNA per Line  Total USF Support Under Current Rules  Total Estimated Reduction to USF Support Levels  Preliminary Adjusted USF  Sum Ln 2+9+19+27  Reduced USF Support per FCC Proposals  Company Percent Reduction in Total USF  Line 28/42  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  3,332,199  3,467,634  3,836,545  3,860,9  4,1303,9  4,1303,9  4,1303,9  4,1436,9		,	25% per yr Elimination		(5,139)	(10,278)	(15,417)
Median Percentage Reduction - All Alexicon Clients	28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	20,556	15,417	10,278	5,139
Company Average SNA per Line   Line 28/42   13.31   9.37   4.07	29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
32 Total USF Support Under Current Rules 33 Total Estimated Reduction to USF Support Levels 34 Total Estimated Reduction to USF Support Levels 35 Sum Ln 2+9+19+27 36 Preliminary Adjusted USF 37 Reduced USF Capped Support per Line 38 Company Percent Reduction in Total USF 39 Median Percent Reduction in Total USF - All Alexicon Clients 40 Average per Line Reduction in Total USF 40 Line (34+36)/42 40 Sum Ln 3+10+21+28 40 Sum Ln 2+9+19+27 40 (590,956) (988,460) (1,303,332,199 40 (590,956) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460) (988,460)	30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
Total USF Support Under Current Rules  Sum Ln 1+8+15+26 Sum Ln 2+9+19+27 O (590,956) (988,460) (1,303,332,199 Sum Ln 3+10+21+28 Sum Ln 3+32,199 Su		Company Average SNA per Line	Line 28/42		13.31	9.37	4.96
Total Estimated Reduction to USF Support Levels  Sum Ln 2+9+19+27  O (590,956) (988,460) (1,303,305)  Preliminary Adjusted USF  Sum Lns 3+10+21+28  3,332,199  2,876,678  2,848,085  2,557,305  Proposed \$3,000 USF Capped Support per Line  Reduced USF Support per FCC Proposals  (Ln 35 - 36)  Company Percent Reduction in Total USF  Line (34+36)/33  Median Percent Reduction in Total USF - All Alexicon Clients  Average per Line Reduction in Total USF  Line (34+36)/42  (510.30) (900.98) (1,257)	32						
Preliminary Adjusted USF   Sum Lns 3+10+21+28   3,332,199   2,876,678   2,848,085   2,557,300	33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	3,332,199	3,467,634	3,836,545	3,860,982
Proposed \$3,000 USF Capped Support per Line         Total USF / Access Lines         0         0         0           37 Reduced USF Support per FCC Proposals         (Ln 35 - 36)         3,332,199         2,876,678         2,848,085         2,557,3           38 Company Percent Reduction in Total USF         Line (34+36)/33         0.0%         -17.0%         -25.8%         -33           39 Median Percent Reduction in Total USF - All Alexicon Clients         All Clients - Median         -16.4%         -25.0%         -33           40 Average per Line Reduction in Total USF         Line (34+36)/42         (510.30)         (900.98)         (1,257)	34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(590,956)	(988,460)	(1,303,167)
Reduced USF Support per FCC Proposals       (Ln 35 - 36)       3,332,199       2,876,678       2,848,085       2,557,33         38       Company Percent Reduction in Total USF       Line (34+36)/33       0.0%       -17.0%       -25.8%       -33         39       Median Percent Reduction in Total USF - All Alexicon Clients       All Clients - Median       -16.4%       -25.0%       -33         40       Average per Line Reduction in Total USF       Line (34+36)/42       (510.30)       (900.98)       (1,257)	35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	3,332,199	2,876,678	2,848,085	2,557,815
38       Company Percent Reduction in Total USF       Line (34+36)/33       0.0%       -17.0%       -25.8%       -33         39       Median Percent Reduction in Total USF - All Alexicon Clients       All Clients - Median       -16.4%       -25.0%       -33         40       Average per Line Reduction in Total USF       Line (34+36)/42       (510.30)       (900.98)       (1,257)	36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
Median Percent Reduction in Total USF - All Alexicon Clients All Clients - Median Average per Line Reduction in Total USF Line (34+36)/42 -16.4% -25.0% (900.98) (1,257)	37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	3,332,199	2,876,678	2,848,085	2,557,815
40 Average per Line Reduction in Total USF Line (34+36)/42 (510.30) (900.98) (1,257)	38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-17.0%	-25.8%	-33.8%
	39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
	40	Average per Line Reduction in Total USF	Line (34+36)/42		(510.30)	(900.98)	(1,257.70)
	41						
		Access Lines	Reduced 5% per yr	1,219	1,158	1,097	1,036

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 4					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	453,444	453,444	453,444	453,444
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(53,559)	(108,741)	(162,300)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	453,444	399,885	344,703	291,144
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-11.8%	-24.0%	-35.8%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		333.02	303.01	270.98
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	141,540	141,540	141,540	141,540
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(56,053)	(104,176)	(141,540)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	141,540	85,487	37,364	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-39.6%	-73.6%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		71.19	32.84	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	493,959	571,628	603,220	628,870
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(78,751)	(82,830)	(86,117)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(96,855)	(198,844)	(296,782)
18	HCL with NACPL Reset	See Footnote 1	0	22,761	22,722	25,154
19	Combined Impact to HCL Support	See Footnote 2	0	(148,701)	(247,368)	(339,333)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	493,959	422,927	355,852	289,537
22	Company Percent Reduction in HCL USF	Line 19/15		-26.0%	-41.0%	-54.0%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		352.20	312.81	269.49
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	0	0	0	0
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	0	0	0
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	0	0	0	0
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)	0	0.0%	0.0%	0.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		-	-	-
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	1,088,943	1,166,612	1,198,204	1,223,854
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(258,313)	(460,285)	(643,173)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	1,088,943	908,299	737,919	580,681
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	1,088,943	908,299	737,919	580,681
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-22.1%	-38.4%	-52.6%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(215.12)	(404.61)	(598.63)
41						-
	Access Lines	Reduced 5% per yr	1,264	1,201	1,138	1,074
				-,	-,0	_,-,-,-

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 5					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	990,991	990,991	990,991	990,991
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(80,814)	(164,076)	(244,890)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	990,991	910,177	826,915	746,101
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-8.2%	-16.6%	-24.7%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		521.83	500.43	478.09
7						
	Local Switching Support Base	2010 Forecast - Kept Flat	341,513	341,513	341,513	341,513
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(135,006)	(251,121)	(341,513)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	341,513	206,507	90,392	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-39.5%	-73.5%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		118.40	54.70	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	1,326,398	1,520,121	1,837,453	1,873,318
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(206,226)	(248,350)	(252,946)
	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(129,027)	(194,437)	(290,205)
18	HCL with NACPL Reset	See Footnote 1	0	31,825	31,771	35,171
19	Combined Impact to HCL Support	See Footnote 2	0	(290,302)	(402,458)	(493,636)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	1,326,398	1,229,819	1,434,995	1,379,682
22	Company Percent Reduction in HCL USF	Line 19/15		-19.1%	-21.9%	-26.4%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		705.09	868.43	884.07
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	27,492	27,492	27,492	27,492
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(6,873)	(13,746)	(20,619)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	27,492	20,619	13,746	6,873
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		11.82	8.32	4.40
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	2,686,394	2,880,117	3,197,449	3,233,314
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(512,995)	(831,401)	(1,100,658)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	2,686,394	2,367,122	2,366,048	2,132,656
	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	2,686,394	2,367,122	2,366,048	2,132,656
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-17.8%	-26.0%	-34.0%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(294.11)	(503.15)	(705.28)
41						
42	Access Lines	Reduced 5% per yr	1,836	1,744	1,652	1,561

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

	pany 6					
	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estir	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	766,164	766,164	766,164	766,164
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(95,280)	(193,448)	(288,728)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	766,164	670,884	572,716	477,436
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-12.4%	-25.2%	-37.7%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		117.74	106.09	93.65
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	246,255	246,255	246,255	246,255
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(91,930)	(175,656)	(246,255)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	246,255	154,325	70,599	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-37.3%	-71.3%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		27.08	13.08	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	123,382	262,365	322,930	425,277
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(40,364)	(49,682)	(65,427)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(155,860)	(320,404)	(425,277)
18	HCL with NACPL Reset	See Footnote 1	0	90,818	90,664	104,468
19	Combined Impact to HCL Support	See Footnote 2	0	(101,782)	(256,884)	(404,259)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	123,382	160,583	66,046	21,018
22	Company Percent Reduction in HCL USF	Line 19/15		-38.8%	-79.5%	-95.1%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		28.18	12.23	4.12
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	149,460	149,460	149,460	149,460
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(37,365)	(74,730)	(112,095)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	149,460	112,095	74,730	37,365
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		19.67	13.84	7.33
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	1,285,261	1,424,244	1,484,809	1,587,156
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(326,357)	(700,718)	(1,051,337)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	1,285,261	1,097,887	784,091	535,819
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	1,285,261	1,097,887	784,091	535,819
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-22.9%	-47.2%	-66.2%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median	2.370	-16.4%	-25.0%	-33.2%
	Average per Line Reduction in Total USF	Line (34+36)/42		(57.27)	(129.81)	(206.21)
41	3 , 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	(5 : 55// 12		(5: 1=1)	()	,
	Access Lines	Reduced 5% per yr	5,998	5,698	5,398	5,098
<u> </u>	I	yi	5,550	3,030	5,555	5,050

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 7					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	229,318	229,318	229,318	229,318
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(26,616)	(54,038)	(80,654)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	229,318	202,702	175,280	148,664
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-11.6%	-23.6%	-35.2%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		300.95	274.69	246.68
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	0	0	0	0
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	0	0	0
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	0	0	0	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		0.0%	0.0%	0.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		-	-	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	488,801	475,629	494,501	509,073
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(64,857)	(67,297)	(69,164)
	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(60,323)	(132,208)	(197,326)
18	HCL with NACPL Reset	See Footnote 1	0	12,930	12,909	14,290
19	Combined Impact to HCL Support	See Footnote 2	0	(105,863)	(170,623)	(227,721)
20				, , ,	` ' '	, , ,
21	HCL with All Proposed Revisions	Line 15 + Line 19	488,801	369,766	323,878	281,352
22	Company Percent Reduction in HCL USF	Line 19/15		-22.3%	-34.5%	-44.7%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		548.98	507.57	466.86
25						
	SNA Calculated per Current Rules	USAC SNA Source Data	0	0	0	0
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	0	0	0
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	0	0	0	0
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		0.0%	0.0%	0.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		-	-	-
32	p- 7 0 p					
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	718,119	704,947	723,819	738,391
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(132,479)	(224,661)	(308,375)
	Preliminary Adjusted USF	Sum Lns 3+10+21+28	718,119	572,468	499,158	430,016
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	718,119	572,468	499,158	430,016
38	Company Percent Reduction in Total USF	i i	0.0%	-18.8%	-31.0%	-41.8%
39	Median Percent Reduction in Total USF - All Alexicon Clients	Line (34+36)/33 All Clients - Median	0.0%	-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(196.69)	(352.08)	-33.2% (511.70)
	Average per line neduction in Total Our	Lille (34±30)/42		(130.03)	(332.08)	(311.70)
41	Access Lines	Doduced Fox -	700	674	638	602
42	Access Lines	Reduced 5% per yr	709	674	058	603

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 8					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	868,490	868,490	868,490	868,490
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(79,035)	(160,464)	(239,499)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	868,490	789,455	708,026	628,991
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-9.1%	-18.5%	-27.6%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		199.14	188.52	177.33
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	170,246	170,246	170,246	170,246
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(69,582)	(127,465)	(170,246)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	170,246	100,664	42,781	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-40.9%	-74.9%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		25.39	11.39	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	530,332	428,314	511,535	596,850
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(65,537)	(76,190)	(87,121)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(153,754)	(323,756)	(489,447)
18	HCL with NACPL Reset	See Footnote 1	0	75,704	75,576	83,664
19	Combined Impact to HCL Support	See Footnote 2	0	(144,127)	(303,454)	(453,084)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	530,332	284,187	208,081	143,766
22	Company Percent Reduction in HCL USF	Line 19/15		-33.6%	-59.3%	-75.9%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		71.69	55.40	40.53
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	84,240	84,240	84,240	84,240
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(21,060)	(42,120)	(63,180)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	84,240	63,180	42,120	21,060
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		15.94	11.21	5.94
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	1,653,308	1,551,290	1,634,511	1,719,826
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(313,804)	(633,503)	(926,009)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	1,653,308	1,237,486	1,001,008	793,817
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	1,653,308	1,237,486	1,001,008	793,817
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-20.2%	-38.8%	-53.8%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median	3.370	-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(79.16)	(168.68)	(261.06)
41	O-			( )	(200.03)	(202.00)
	Access Lines	Reduced 5% per yr	4,173	3,964	3,756	3,547
74	MODEL STATES	Neudced 3/6 per yr	4,173	3,304	3,730	3,347

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 9					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	1,198,723	1,198,723	1,198,723	1,198,723
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(54,093)	(109,825)	(163,918)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	1,198,723	1,144,630	1,088,898	1,034,805
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-4.5%	-9.2%	-13.7%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		866.19	869.80	875.21
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	188,233	188,233	188,233	188,233
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(68,451)	(132,450)	(188,233)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	188,233	119,782	55,783	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-36.4%	-70.4%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		90.64	44.56	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	2,136,457	2,308,603	2,548,661	2,577,004
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(310,614)	(342,474)	(346,106)
	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(107,224)	(234,068)	(349,356)
18	HCL with NACPL Reset	See Footnote 1	0	25,150	25,107	27,794
19	Combined Impact to HCL Support	See Footnote 2	0	(381,614)	(528,311)	(636,611)
20						
	HCL with All Proposed Revisions	Line 15 + Line 19	2,136,457	1,926,989	2,020,350	1,940,393
22	Company Percent Reduction in HCL USF	Line 19/15		-16.5%	-20.7%	-24.7%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		1,458.24	1,613.83	1,641.13
25			24.024	24.024	24.024	24.024
26	SNA Calculated per Current Rules	USAC SNA Source Data	24,924	24,924	24,924	24,924
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(6,231)	(12,462)	(18,693)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	24,924	18,693	12,462	6,231
	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		14.15	9.95	5.27
32	Tabel USE Command Unider Command Bullet		2 540 227	2 720 462	2.000.544	2 000 004
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	3,548,337	3,720,483	3,960,541	3,988,884
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	2 549 227	(510,389)	(783,048)	(1,007,455)
	Preliminary Adjusted USF	Sum Lns 3+10+21+28	3,548,337	3,210,094	3,177,493	2,981,429
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	2 177 403	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	3,548,337	3,210,094	3,177,493	2,981,429
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-13.7%	-19.8%	-25.3%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
	Average per Line Reduction in Total USF	Line (34+36)/42		(386.23)	(625.49)	(852.08)
41	Assaulting	2 1 150	4 204	4 224	4 252	4.463
42	Access Lines	Reduced 5% per yr	1,391	1,321	1,252	1,182

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Con	pany 10					
Nati	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Esti	mated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	2,216,964	2,216,964	2,216,964	2,216,964
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(145,364)	(295,133)	(440,497)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	2,216,964	2,071,600	1,921,831	1,776,467
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-6.6%	-13.3%	-19.9%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		316.72	310.15	303.55
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	341,549	341,549	341,549	341,549
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(124,052)	(240,178)	(341,549)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	341,549	217,497	101,371	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-36.3%	-70.3%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		33.25	16.36	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	1,814,562	2,544,686	2,979,863	3,127,802
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(353,907)	(411,161)	(430,117)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(273,426)	(550,620)	(821,820)
18	HCL with NACPL Reset	See Footnote 1	0	131,275	131,052	145,077
19	Combined Impact to HCL Support	See Footnote 2	0	(490,410)	(796,691)	(1,049,584)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	1,814,562	2,054,276	2,183,172	2,078,218
22	Company Percent Reduction in HCL USF	Line 19/15		-19.3%	-26.7%	-33.6%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		314.07	352.32	355.11
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	395,652	395,652	395,652	395,652
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(98,913)	(197,826)	(296,739)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	395,652	296,739	197,826	98,913
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		45.37	31.93	16.90
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	4,768,727	5,498,851	5,934,028	6,081,967
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(858,739)	(1,529,828)	(2,128,369)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	4,768,727	4,640,112	4,404,200	3,953,598
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	4,768,727	4,640,112	4,404,200	3,953,598
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-15.6%	-25.8%	-35.0%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(131.29)	(246.89)	(363.68)
41						
42	Access Lines	Reduced 5% per yr	6,885	6,541	6,197	5,852

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 11					
Natio	onal Broadband Plan NPRM February 2011		2011	2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	1,070,518	1,070,518	1,070,518	1,070,518
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(61,855)	(125,585)	(187,440)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	1,070,518	1,008,663	944,933	883,078
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-5.8%	-11.7%	-17.5%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		517.67	511.91	506.54
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	•	52,695	52,695	52,695
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(19,914)	(37,830)	(52,695)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	52,695	32,781	14,865	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-37.8%	-71.8%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		16.82	8.05	-
14						
	HCL Calculated Under Current Rules	HCL Calculated	1,147,260	1,141,984	1,489,665	1,531,593
	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated		(156,407)	(202,546)	(207,918)
	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(123,960)	(267,889)	(399,835)
	HCL with NACPL Reset	See Footnote 1	0	37,205	37,142	41,117
	Combined Impact to HCL Support	See Footnote 2	0	(237,133)	(414,722)	(518,594)
20						
	HCL with All Proposed Revisions	Line 15 + Line 19	1,147,260	904,851	1,074,943	1,012,999
	Company Percent Reduction in HCL USF	Line 19/15		-20.8%	-27.8%	-33.9%
	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
	Company Average HCL per Line	Line 21/42		464.40	582.34	581.06
25						
	SNA Calculated per Current Rules	USAC SNA Source Data		45,912	45,912	45,912
	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(11,478)	(22,956)	(34,434)
	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	45,912	34,434	22,956	11,478
	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		17.67	12.44	6.58
32						
	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	2,316,385	2,311,109	2,658,790	2,700,718
	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27		(330,380)	(601,093)	(793,163)
	Preliminary Adjusted USF	Sum Lns 3+10+21+28	2,316,385	1,980,729	2,057,697	1,907,555
	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	2,316,385	1,980,729	2,057,697	1,907,555
	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-14.3%	-22.6%	-29.4%
	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(169.56)	(325.64)	(454.96)
41						
42	Access Lines	Reduced 5% per yr	2,051	1,948	1,846	1,743

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 12					
Nati	onal Broadband Plan NPRM February 2011	2011	2012	2013	2014	
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	1,100,981	1,100,981	1,100,981	1,100,981
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(83,377)	(169,280)	(252,657)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	1,100,981	1,017,604	931,701	848,324
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-7.6%	-15.4%	-22.9%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		566.75	547.74	528.06
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	84,576	84,576	84,576	84,576
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(30,627)	(59,382)	(84,576)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	84,576	53,949	25,194	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-36.2%	-70.2%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		30.05	14.81	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	2,030,816	2,253,113	2,607,904	2,645,988
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(304,178)	(351,285)	(356,165)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(147,202)	(305,531)	(456,017)
18	HCL with NACPL Reset	See Footnote 1	0	33,794	33,737	37,348
19	Combined Impact to HCL Support	See Footnote 2	0	(414,845)	(611,839)	(756,392)
20	, , , , , , , , , , , , , , , , , , , ,					
21	HCL with All Proposed Revisions	Line 15 + Line 19	2,030,816	1,838,268	1,996,065	1,889,596
22	Company Percent Reduction in HCL USF	Line 19/15		-18.4%	-23.5%	-28.6%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		1,023.82	1,173.47	1,176.22
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	32,424	32,424	32,424	32,424
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(8,106)	(16,212)	(24,318)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	32,424	24,318	16,212	8,106
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		13.54	9.53	5.05
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	3,248,797	3,471,094	3,825,885	3,863,969
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(536,955)	(856,713)	(1,117,943)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	3,248,797	2,934,139	2,969,172	2,746,026
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	3,248,797	2,934,139	2,969,172	2,746,026
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-15.5%	-22.4%	-28.9%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(299.06)	(503.65)	(695.89)
41						
	Access Lines	Reduced 5% per yr	1,890	1,796	1,701	1,607
	<u> </u>					•

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 13					
National Broadband Plan NPRM February 2011				2012	2013	2014
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	354,800	354,800	354,800	354,800
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(26,229)	(53,254)	(79,483)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	354,800	328,571	301,546	275,317
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-7.4%	-15.0%	-22.4%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		221.85	214.91	207.76
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	0	0	0	0
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	0	0	0
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	0	0	0	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		0.0%	0.0%	0.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		-	-	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	372,364	457,696	460,136	492,096
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(64,183)	(64,343)	(68,438)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(58,104)	(120,415)	(179,724)
18	HCL with NACPL Reset	See Footnote 1	0	28,360	28,311	31,341
19	Combined Impact to HCL Support	See Footnote 2	0	(89,814)	(144,019)	(196,873)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	372,364	367,882	316,117	295,223
22	Company Percent Reduction in HCL USF	Line 19/15		-19.6%	-31.3%	-40.0%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		248.39	225.30	222.78
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	0	0	0	0
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	0	0	0
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	0	0	0	0
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		0.0%	0.0%	0.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		-	-	-
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	727,164	812,496	814,936	846,896
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(116,043)	(197,273)	(276,356)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	727,164	696,453	617,663	570,540
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	727,164	696,453	617,663	570,540
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-14.3%	-24.2%	-32.6%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(78.35)	(140.60)	(208.55)
41						
	Access Lines	Reduced 5% per yr	1,559	1,481	1,403	1,325

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Com	pany 14					
Nati	onal Broadband Plan NPRM February 2011	2011	2012	2013	2014	
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	9,765,956	9,765,956	9,765,956	9,765,956
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(168,905)	(342,928)	(511,833)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	9,765,956	9,597,051	9,423,028	9,254,123
4	Company Percent Reduction in ICLS	(Ln 2 / Ln 1)		-1.7%	-3.5%	-5.2%
5	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Company Average ICLS per Line	Line 3/42		730.72	757.33	787.50
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	393,972	393,972	393,972	393,972
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(130,011)	(263,961)	(393,972)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	393,972	263,961	130,011	0
11	Company Percent Reduction in LSS	(Ln 9 / Ln 8)		-33.0%	-67.0%	-100.0%
12	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Company Average LSS per Line	Line 10/42		20.10	10.45	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	15,622,978	15,896,882	16,124,647	16,352,413
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(1,715,138)	(1,737,963)	(1,760,787)
17	HCL with Corp Exp Phased Down to Zero by 2014 (33%/66%/100%)	HCL Calculated	0	(234,971)	(477,061)	(712,032)
18	HCL with NACPL Reset	See Footnote 1	0	158,066	157,797	174,685
19	Combined Impact to HCL Support	See Footnote 2	0	(4,946,296)	(5,228,802)	(5,490,179)
20	· · · · · · · · · · · · · · · · · · ·					
21	HCL with All Proposed Revisions	Line 15 + Line 19	15,622,978	10,950,586	10,895,845	10,862,234
22	Company Percent Reduction in HCL USF	Line 19/15		-31.1%	-32.4%	-33.6%
23	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Company Average HCL per Line	Line 21/42		833.77	875.70	924.35
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	140,304	140,304	140,304	140,304
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(35,076)	(70,152)	(105,228)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	140,304	105,228	70,152	35,076
29	Company Percent Reduction in SNA	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction - All Alexicon Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Company Average SNA per Line	Line 28/42		8.01	5.64	2.98
32	, , ,					
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	25,923,210	26,197,114	26,424,879	26,652,645
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(5,280,288)	(5,905,843)	(6,501,212)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	25,923,210	20,916,826	20,519,035	20,151,433
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	25,923,210	20,916,826	20,519,035	20,151,433
38	Company Percent Reduction in Total USF	Line (34+36)/33	0.0%	-20.2%	-22.3%	-24.4%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median	0.0%	-20.2%	-22.5%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(402.04)	(474.65)	(553.24)
41	Average per line neduction in Total OF	Lille (34±30)/42		(402.04)	(474.03)	(333.24)
	Access Lines	Poduced Fo/ nerror	12 025	12 124	12 442	11 751
42	Access cines	Reduced 5% per yr	13,825	13,134	12,443	11,751

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

	Alexicon Clients - Data Averaged Together					
National Broadband Plan NPRM February 2011			2011	2012	2013	2014
Estir	Estimated Reduction to ALL USF Mechanisms per FCC Proposals Source					
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	2,353,140	2,353,140	2,353,140	2,353,140
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(110,690)	(224,733)	(335,423)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	2,353,140	2,242,450	2,128,406	2,017,717
4	Average Percentage Reduction-All Clients	(Ln 2 / Ln 1)		-4.7%	-9.6%	-14.3%
5	Median Percentage Reduction- All Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Average ICLS per Line	Line 3/42		451.58	452.43	454.13
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	202,300	202,300	202,300	202,300
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(75,702)	(143,905)	(202,300)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	202,300	126,598	58,395	0
11	Average Percentage Reduction-All Clients	(Ln 9 / Ln 8)		-37.4%	-71.1%	-100.0%
12	Median Percentage Reduction- All Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Average LSS per Line	Line 10/42		25.49	12.41	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	3,140,545	3,521,495	3,986,146	4,113,123
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(450,940)	(512,104)	(523,881)
17	HCL with Proposed Corporate Exp Phased Down to Zero by 2014	HCL Calculated	0	(188,136)	(378,080)	(574,443)
18	HCL with NACPL Reset	See Footnote 1	0	87,186	86,878	96,469
19	Combined Impact to HCL Support	See Footnote 2	0	(770,576)	(1,002,285)	(1,167,452)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	3,140,545	2,750,918	2,983,861	2,945,672
22	Average Percentage Reduction-All Clients	Line 19/15		-15.7%	-20.2%	-24.4%
23	Median Percentage Reduction- All Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Average HCL per Line	Line 21/42		553.97	634.27	662.98
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	115,781	115,781	115,781	115,781
27	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(28,945)	(57,891)	(86,836)
28	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	115,781	86,836	57,891	28,945
29	Average Percentage Reduction-All Clients	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
30	Median Percentage Reduction- All Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
31	Average SNA per Line	Line 28/42		17.49	12.31	6.51
32						
33	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	5,811,766	6,192,716	6,657,367	6,784,344
34	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(985,913)	(1,428,814)	(1,792,011)
35	Preliminary Adjusted USF	Sum Lns 3+10+21+28	5,811,766	5,206,803	5,228,553	4,992,334
36	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
37	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	5,811,766	5,206,803	5,228,553	4,992,334
38	Average Percentage Reduction in Total USF	Line (34+36)/33	0.0%	-15.9%	-21.5%	-26.4%
39	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median		-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(198.54)	(303.72)	(403.33)
41		. "		,		
	Average Access Lines	Reduced 5% per yr	5,227	4,966	4,704	4,443

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Alex	icon - All Clients Data Combined					
Natio	onal Broadband Plan NPRM February 2011	2011	2012	2013	2014	
Estin	nated Reduction to ALL USF Mechanisms per FCC Proposals	Source				
1	ICLS Base (CL Rev Req less SLCs)	2010 Forecast-Kept Flat	32,943,956	32,943,956	32,943,956	32,943,956
2	Reduction to ICLS Funding Due to Corp Exp Phase-out by 2014	33%/66%/100% Corp Exp	0	(1,549,655)	(3,146,268)	(4,695,923)
3	Revised ICLS with Proposed Changes (Less SLC Revenues)	(Line 2 - Line 1)	32,943,956	31,394,301	29,797,688	28,248,033
4	Average Percentage Reduction-All Clients	(Ln 2 / Ln 1)		-4.7%	-9.6%	-14.3%
5	Median Percentage Reduction- All Clients	All Clients - Median		-7.2%	-14.7%	-21.9%
6	Average ICLS per Line	Line 3/42		451.58	452.43	454.13
7						
8	Local Switching Support Base	2010 Forecast - Kept Flat	2,832,202	2,832,202	2,832,202	2,832,202
9	Proposed Reduction to Local Switching Support	Eliminate 33%/67%/100%	0	(1,059,826)	(2,014,672)	(2,832,202)
10	LSS Phased Down to Zero by 2014	(Line 8 - Line 9)	2,832,202	1,772,376	817,530	0
11	Average Percentage Reduction-All Clients	(Ln 9 / Ln 8)		-37.4%	-71.1%	-100.0%
12	Median Percentage Reduction- All Clients	All Clients - Median		-37.1%	-70.8%	-100.0%
13	Average LSS per Line	Line 10/42		25.49	12.41	-
14						
15	HCL Calculated Under Current Rules	HCL Calculated	43,967,626	49,300,926	55,806,048	57,583,727
16	HCL with Proposed 55%/65% Factors Reduced From 65%/75%	HCL Calculated	0	(6,313,154)	(7,169,455)	(7,334,335)
17	HCL with Proposed Corporate Exp Phased Down to Zero by 2014	HCL Calculated	0	(2,633,901)	(6,539,909)	(8,042,201)
18	HCL with NACPL Reset	See Footnote 1	0	1,220,605	1,216,293	1,350,562
19	Combined Impact to HCL Support	See Footnote 2	0	(10,788,068)	(14,031,988)	(16,344,324)
20						
21	HCL with All Proposed Revisions	Line 15 + Line 19	43,967,626	38,512,858	41,774,060	41,239,403
22	Average Percentage Reduction-All Clients	Line 19/15		-15.7%	-22.4%	-24.4%
	Median Percentage Reduction- All Clients	All Clients - Median		-19.4%	-27.3%	-33.6%
24	Average HCL per Line	Line 21/42		553.97	634.27	662.98
25						
26	SNA Calculated per Current Rules	USAC SNA Source Data	1,620,936	1,620,936	1,620,936	1,620,936
	Reduction to SNA - Phased Down to Zero by 2015	25% per yr Elimination	0	(405,234)	(810,468)	(1,215,702)
	Estimated Revised Safety Net Additive Support-Zero in 2015	(Ln 26-Ln 27)	1,620,936	1,215,702	810,468	405,234
29	Average Percentage Reduction-All Clients	(Ln 27 / Ln 26)		-25.0%	-50.0%	-75.0%
	Median Percentage Reduction- All Clients	All Clients - Median		-25.0%	-50.0%	-75.0%
	Average SNA per Line	Line 28/42		17.49	12.31	6.51
32	<u> </u>					
_	Total USF Support Under Current Rules	Sum Ln 1+8+15+26	81,364,720	86,698,020	93,203,142	94,980,821
	Total Estimated Reduction to USF Support Levels	Sum Ln 2+9+19+27	0	(13,802,782)	(20,003,397)	(25,088,151)
	Preliminary Adjusted USF	Sum Lns 3+10+21+28	81,364,720	72,895,237	73,199,745	69,892,670
	Proposed \$3,000 USF Capped Support per Line	Total USF / Access Lines	0	0	0	0
	Reduced USF Support per FCC Proposals	(Ln 35 - 36)	81,364,720	72,895,237	73,199,745	69,892,670
	Average Percentage Reduction in Total USF	Line (34+36)/33	0.0%	-15.9%	-21.5%	-26.4%
	Median Percent Reduction in Total USF - All Alexicon Clients	All Clients - Median	0.070	-16.4%	-25.0%	-33.2%
40	Average per Line Reduction in Total USF	Line (34+36)/42		(198.54)	(303.72)	(403.33)
41		210 (34.30)/42		(155.54)	(555.72)	(100.00)
	Access Lines	Reduced 5% per yr	73,180	69,521	65,862	62,203
72	resess Lines	neduced 370 per yr	, 5,100	05,321	05,002	02,203

<sup>1)</sup> Revised NACPL was calculated by taking the entire national USF database used to calculate the current NACPL today and removing the corporate expenses (33% in 2012, 67% in 2013 and 100% in 2014) from the NACPL HCL Calculation. The reduction to the NACPL is -4.67%, -9.34% & -14.14%, respectively. These factors were applied to the current NACPL of \$458.00. However, the NACPL has increased 9.75% on average over the past two years due to the capped HCL fund. Therefore, to be conservative, we assumed that only half of this increase would continue per year and the NACPL was increased in 2013 by 4.87% and by another 4.87% in 2014. This results in NACPL reductions, from the current \$458, to \$436.61 in 2012, \$435.46 in 2013 and \$431.58 in 2014.

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<sup>2)</sup> This line item represents the combined impact of all three HCL scenarios (55%/65% revision, corporate expense reduced 33% per year, and increase to the NACPL). This line item will not sum to the above three individual calculations. This is because when all three items are calculated collectively, the overall combined impact will produce a different HCL support total than when each item is computed individually.

Analysis of USF Reform NPRM Released 2/9/2011
COMPANY: AVERAGE OF ALL FWA CLIENT COMPANIES OPERATING IN KANSAS

Line	Description	Source	2010	2011	2012	2013	2014
	REGULATED REVENUES				•	•	
	Revenues - USF Support:						
LN1	NECA-ICLS	3 year forecast	\$1,963,341	\$1,911,481	\$1,867,048	\$1,824,574	\$1,784,007
LN2	NECA-LSS	3 year forecast	\$297,994	\$256,951	\$237,750	\$220,365	\$204,623
LN3	USF SNA	From USAC Appendix 1	\$364,663	\$319,906	\$303,769	\$256,999	\$234,594
LN4	USF HCL	3yr forecast and USAC Appedix 1	\$1,289,075	\$ 1,182,875	\$1,061,036	\$871,315	\$683,169
LN5	SUBTOTAL -USF	=(Sum LN1 thru LN4)	\$3,915,073	\$3,671,213	\$3,469,603	\$3,173,253	\$2,906,393
LN6	1.3 Loops		4,539	4,311	4,104	3,911	3,730
LN7	Annual USF Support per Line	=(LN5 / LN6)	\$863	\$852	\$845	\$811	\$779
LN7a	Monthly USF Support per Line	=(LN7 /12)	\$72	\$71	\$70	\$68	\$65
	Other Regulated Revenues:						
	Other Interstate Revenues (ie. NECA						
LN8	settlements, Interstate Access, etc.)	Interstate Less ICLS and LSS	\$3,456,175	\$3,056,706	\$2,918,141	\$2,786,558	\$2,661,560
	Other Revenue (ie Local, Intrastate Access,						
LN9	etc)	Total Reg Revenue Less Above	\$3,328,565	\$3,328,565	\$3,328,565	\$3,328,565	\$3,328,565
LN10	SUBTOTAL - All other Reg. Revenues:	=(Sum LN8 + LN9)	\$6,784,740	\$6,385,271	\$6,246,707	\$6,115,123	\$5,990,125
LN 11	TOTAL REGULATED REVENUES	=(LN7 + LN10)	\$10,699,813	\$10,056,483	\$9,716,309	\$9,288,376	\$8,896,518
		(Control Control	¥10,000,010	<del>+10,000,100</del>	<del>+5). 15). 15</del>	<del>+5</del> ,255,575	<del>+</del>
	Regulated Operating Expense, Interest, Other:						
LN12	Op. Expense	From Forecast	\$9,016,754	\$8,882,212	\$8,737,157	\$8,771,631	\$8,806,452
LN13	Interest	From Forecast	\$945,139	\$893,426	\$866,887	\$788,833	\$718,246
LN14	Other	All Other Income Stmt Items	\$23,445	\$5,124	\$27,200	\$14,312	\$7,531
LN15	TOTAL OPERATING EXPENSE, INTEREST, ETC	=(Sum LN12 + LN14)	\$9,985,338	\$9,780,762	\$9,631,244	\$9,574,776	\$9,532,228
LN16	Net Income Before Tax	=(LN11 - LN15)	\$714,474	\$275,722	\$85,065	(\$286,401)	(\$635,710)
LN 17	Net Investment	3 Year Forecast	\$17,814,874	\$16,038,348	\$14,979,524	\$14,089,163	\$13,350,501
LN 18	ROR	=(LN16 / LN17)	4.01%	1.72%	0.57%	-2.03%	-4.76%
LN 18a	HCL Cap Revenue Effect	From Forecast			(\$112,883)	(\$301,140)	(\$493,019)
LN 19	TIER	=((LN13+LN16)/LN13)	1.7559	1.3086	1.0981	0.6369	0.1149
	NPRM Impacts				2012	2013	2014
LN 20	High Cost Loop Fund				(\$14,165)	\$3,651	\$46,324
LN 20 LN 21	Safety Net Additive				(\$14,103)	(\$44,018)	(\$52,238)
LN 21	LSS				(\$25,510)	(\$254,064)	(\$379,200)
LN 23	ICLS				(\$68,838)	(\$139,762)	(\$208,600)
LN 24	\$3000/Ln Support Limitation				\$0	\$0	\$0
LN 25	Total Support Reduction	=(Sum LN20 thru LN24)			(\$234,055)	(\$434,193)	(\$593,715)
LN 25A	Total Monthly Support Reduction Per Line	=(Line 25 / Line 6 / 12)			(\$5)	(\$9)	(\$13)
LN 25B	% Support Reduction Per Line	=(Line 25 / Line 5)			-7%	-14%	-20%
LN 26	Estimated USF Support to be received if cur				\$3,235,548	\$2,739,060	\$2,312,678
	•	•					
LN 27	Modified Net Income	=(LN16 + LN25)			(\$148,990)	(\$720,594)	(\$1,229,425)
					,	,	
LN 28	Modified ROR	=(LN28 / LN 17)			-0.99%	-5.11%	-9.21%
LN 29	Modified TIER	=((LN13+LN27)/LN13)			0.8281	0.0865	-0.7117

### Analysis of USF Reform NPRM Released 2/9/2011 COMPANY: Pioneer Telephone Association

Line	Description	Source	2010	2011	2012	2013	2014	
Line	REGULATED REVENUES	Source	2010	2011	2012	2013	2014	
	Revenues - USF Support:							
LN1	NECA-ICLS	3 year forecast	\$3,896,996	\$3,842,880	\$3,754,289	\$3,667,741	\$3,583,188	
LN2	NECA-LSS	3 year forecast	\$534,075	\$498,651	\$464,042	\$431,835	\$401,863	
LN3	USF SNA	From USAC Appendix 1	\$0	\$0	\$0	\$0	\$0	
LN4	USF HCL	3yr forecast and USAC Appedix 1	\$2,702,364		\$1,802,941	\$1,291,646	\$842,850	
LN5	SUBTOTAL -USF	=(Sum LN1 thru LN4)	\$7,133,435	\$6,628,407	\$6,021,273	\$5,391,222	\$4,827,902	
LN6	1.3 Loops	,	12,055	11,130	10,305	9,541	8,834	
LN7	Annual USF Support per Line	=(LN5 / LN6)	\$592	\$596	\$584	\$565	\$547	
LN7a	Monthly USF Support per Line	=(LN7 /12)	\$49	\$50	\$49	\$47	\$46	
	Other Regulated Revenues:							
	Other Interstate Revenues (ie. NECA settlements							
LN8	Interstate Access, etc.)	' Interstate Less ICLS and LSS	\$5,838,147	\$5,923,766	\$5,657,559	\$5,403,316	\$5,160,498	
LN9	Other Revenue (ie Local, Intrastate Access, etc.)	Total Reg Revenue Less Above	\$6,863,916	\$6,863,916	\$6,863,916	\$6,863,916	\$6,863,916	
LN10	SUBTOTAL - All other Reg. Revenues:	=(Sum LN8 + LN9)	\$12,702,063	\$12,787,682	\$12,521,475	\$12,267,232	\$12,024,414	
LN 11	TOTAL REGULATED REVENUES	=(LN7 + LN10)	\$19,835,498	\$19,416,088	\$18,542,748	\$17,658,454	\$16,852,315	
		(2.17 + 2.126)	<b>¥25,000,100</b>	<del>+13</del> /.13/000	Ψ10,0 .1,r .0	<b>417,000,10</b> 1	<b>\$10,002,013</b>	
	Regulated Operating Expense, Interest, Other:							
LN12	Op. Expense	From Forecast	\$19,851,881	\$19,846,604	\$19,181,730	\$19,181,730	\$19,181,730	
LN13	Interest	From Forecast	\$796,038	\$868,870	\$1,017,234	\$940,941	\$870,370	
LN14	Other	All Other Income Stmt Items	\$0	\$0	\$0	\$0	\$0	
LN15	TOTAL OPERATING EXPENSE, INTEREST, ETC	=(Sum LN12 + LN14)	\$20,647,919	\$20,715,474	\$20,198,964	\$20,122,671	\$20,052,101	
LN16	Net Income Before Tax	=(LN11 - LN15)	(\$812,420)	(\$1,299,385)	(\$1,656,216)	(\$2,464,218)	(\$3,199,786)	
LN 17	Net Investment	3 Year Forecast	\$21,409,351	\$18,514,386	\$19,754,935	\$21,078,606	\$22,490,969	
LN 18	ROR	=(LN16 / LN17)	-3.79%	-7.02%	-8.38%	-11.69%	-14.23%	
LN 18a	HCL Cap Revenue Effect	From Forecast	-3.75/0	-7.02/0	(\$580,675)	(\$1,168,031)	(\$1,739,514)	
214 200	The cup hevenue Effect	Trom rorecase			(\$300,073)	(71,100,031)	(71,733,314)	
LN 19	TIER	=((LN13+LN16)/LN13)	-0.0206	-0.4955	-0.6282	-1.6189	-2.6763	
	NPRM Impacts				2012	2013	2014	
LN 20	High Cost Loop Fund				\$159,831	\$392,857	\$659,719	
LN 21	Safety Net Additive				\$0	\$0	\$0	
LN 22	LSS				(\$282,150)	(\$572,850)	(\$855,000)	
LN 23	ICLS				(\$102,300)	(\$207,700)	(\$310,000)	
LN 24	\$3000/Ln Support Limitation	= Compare to Line 7			\$0	\$0	\$0	
LN 25	Total Support Reduction	=(Sum LN20 thru LN24)			(\$224,619)	(\$387,693)	(\$505,281)	
LN 25A LN 25B	Total Monthly Support Reduction Per Line % Support Reduction Per Line	=(Line 25 / Line 6 / 12) =(Line 25 / Line 5)			(\$2) -4%	(\$3) -7%	(\$5) -10%	
LN 256	Estimated USF Support to be received if current				\$5,796,654	\$5,003,529	\$4,322,621	
LIV LO	Estimated ost Support to be received it current	THE RIVERS IN PROPERTY OF THE PARTY OF THE P			<b>43,730,03</b> 4	\$3,003,3 <u>2</u> 3	<b>7</b> 4,522,021	
LN 27	Modified Net Income	=(LN16 + LN25)			(\$1,880,835)	(\$2,851,911)	(\$3,705,066)	
LN 28	Modified ROR	=(LN28 / LN 17)			-9.52%	-13.53%	-16.47%	
LN 29	Modified TIER	=((LN13+LN27)/LN13)			-0.8490	-2.0309	-3.2569	
LN 221	Not New Pers Pers Cit.				¢022.055	<b>4000</b> 000	¢022.055	
LN 30A	Net Non-Reg Profit/(Loss)	2010 amounts carried forward			\$822,969	\$822,969	\$822,969	
LN 30B	Modified Net Income with Non-Reg Profit	=(LN27 + LN30A)			(\$1,057,866)	(\$2,028,942)	(\$2,882,097)	
LN 30C	Modified ROR with Non-Reg Profit	=(LN30B / LN 17)			-5.35%	-9.63%	-12.81%	
LN 30C	Modified TIER with Non-Reg Profit	=((LN13+LN30B)/LN13)			-0.0399	-1.1563	-2.3113	